

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

PUBLIC SERVICE  
COMMISSION

AN ADJUSTMENT OF THE GAS AND ELECTRIC )  
RATES, TERMS, AND CONDITIONS OF ) CASE NO. 2003-00433  
LOUISVILLE GAS AND ELECTRIC COMPANY )

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**MOTION FOR FULL INTERVENTION**

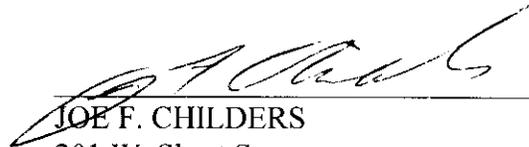
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Comes now the Kentucky Association for Community Action, Inc. (KACA), 101 Burch Court, Frankfort, KY 40601, by counsel, pursuant to 807 KAR 5:001 Section 3(8), and hereby moves for leave to intervene as a full party in the above-referenced proceeding. In support of this motion, KACA states as follows:

1. KACA is a Kentucky non-profit, 501(c)(3) public interest corporation which represents Kentucky's twenty three (23) Community Action Agencies. KACA operates the Low Income Home Energy Assistance Program (LIHEAP) in all 120 Kentucky counties and provides assistance to 150,000 low income households in the state each year. KACA also provides technical assistance on an on-going basis to the state's four Demand-Side Management (DSM) Programs operated by American Electric Power, Louisville Gas and Electric Company, Union Light Heat and Power, and Western Kentucky Gas. These programs provide a variety of conservation services for low income households.
2. In this proceeding, the Commission will examine the request by Louisville Gas and Electric Company for an adjustment to its rates, which if approved as

requested could have a significant impact on the low-income clients served by KACA and the twenty three (23) community action agencies which are members of KACA.

4. KACA expects to present testimony from Kip Bowmar, Executive Director. Additionally, KACA may choose to present testimony from other witnesses not yet identified.
5. The intervention of KACA into this action is likely to present issues and facts that will not be adequately addressed or represented by any other party and will be helpful to the Commission in fully considering the matters without unduly complicating or disrupting this proceeding.
6. KACA respectfully requests that it be granted leave for full intervention and to participate fully as a party in this proceeding, including the right to present testimony and exhibits, present witnesses, cross examine witnesses, present argument and file briefs as allowed by the Commission.



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ACTION, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing document has been served on the following persons:

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on this the 21<sup>st</sup> day of January, 2004.

  
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JOE F. CHILDERS